

## DISCRETIONARY GRANT ADMINISTRATION Responsibilities and Terminology

**Q1. As a grantee, what are the responsibilities under a discretionary grant?**

As a grantee under the **National Resource Centers** (NRC) Program and Foreign Language and Area Studies (FLAS) Fellowships Program, the institution is the legal entity accountable to the Federal Government for the use of the funds awarded. You have the following responsibilities when administering a grant funded by the Department of Education (US/ED):

- Perform the scope of work described in the application
- Exercise proper stewardship of federal funds
- Comply with all legislative and regulatory requirements
- Demonstrate and/or measure progress towards achievement of project goals
- Report all required information to the US/ED

**Q2. What is a project period? What is a budget period?**

US/ED has established a system of project periods and budget periods to divide up funding of multi-year grants. A **project period**, also referred to as the performance period, is the total time from beginning to end that US/ED authorizes a grantee to complete the project activities described in the application. The FY 2000 – 03 NRC/FLAS project period is 36 months, beginning August 15, 2003 and ending August 14, 2006.

When US/ED awards grants with project periods that are longer than a year, it generally funds the grants in annual increments called budget periods. A **budget period** is the 12-month period for expending grant funds. NRC/FLAS grants consist of three budget periods; the first budget period begins on August 15, 2003 and ends on August 14, 2004; the second budget period is August 15, 2004 – August 14, 2005; and the third budget period is August 14, 2005 – August 15, 2006.

**Q3. Which academic years correspond to fiscal years (FY) and budget periods in the FY03-FY05 project period?**

The chart below shows which academic years correspond to which fiscal years and budget periods in the current grant cycle:

<u>Academic Year</u>	<u>Fiscal Year</u>	<u>Budget Period</u>
2003-04	2003	8/15/03-8/14/04
2004-05	2004	8/15/04-8/14/05
2005-06	2005	8/15/05-8/14/06

**Q4. What is a Grant Award Notification (GAN) and who receives it?**

The GAN is the official document that states the terms, conditions, and amount of the grant award. The document is formatted into numbered blocks that provide information about the award, including administrative information, legislative and fiscal data, and names and phone numbers of project staff. For multi-year awards, the GAN also includes information on anticipated subsequent funding periods and their tentative levels of funding. The GAN also contains attachments

that spell out additional terms and conditions of the grant and enclosures that give further guidance on administrative procedures.

Two copies of the GAN are mailed to each grantee. One copy is sent to the certifying official, the authorized representative who signed the Application for Federal Education Assistance Form (ED 424). The second copy is sent to the Project Director.

**Q5. *How do we actually get our grant funds, and how long does it take?***

Grantees get their grant funds by making a request through the Grant Administration and Payment System (GAPS) which is accessed via the Internet. Grantees withdraw funds for each separate grant award by its PR/Award number. Requests for payments must be limited to the amounts actually needed and be timed in accordance with the immediate cash requirements of the grantee in carrying out the project.

Once a request for grant funds has been made through GAPS, the US/ED pays a grantee using one of two methods:

- (1.) Automated Clearinghouse/Electronic Funds Transfer (ACH/EFT); or,
- (2.) FEDWIRE Electronic Funds Transfer

With the ACHEFT method, funds are deposited in your bank account approximately three days after you have sent a payment request. With the FEDWIRE method, approved payments are transferred electronically the next day.

**Q6. *What are “excessive drawdowns” and how are they monitored?***

“Excessive drawdowns” occur when grantees draw more funds than are needed for the immediate cash requirements of a grant. Grantees are required by regulation to minimize the amount of time elapsing between transfer of funds (drawdown) and the disbursement of funds from their bank accounts (EDGAR 74.21-22). Funds must be drawn only to meet a grantee’s immediate cash needs for each grant. Drawdowns must be made as close as possible to the actual disbursements.

A GAPS Drawdown Report enables US/ED to identify grantees that might have violated cash management policies and regulations by drawing down funds in excess of a grant’s immediate cash needs. The report indicates grants that have drawn an unusually large proportion of grant funds in any of the first three quarters of the grant’s current budget period. A grant will appear on the report if the following drawdown thresholds are exceeded:

- As of the end of the first quarter of the grant’s current budget period, **more than 50%** of the funds obligated for the budget period have been drawn.
- As of the end of the second quarter of the grant’s current budget period, **more than 80%** of the funds obligated for the budget period have been drawn.
- As of the end of the third quarter of the grant’s current budget period, **100%** of the funds obligated for that budget period have been drawn

For grants meeting the above criteria, the report will indicate the actual percentage of the current budget period’s funds that have been drawn down by the end of a particular quarter.

**Note:** Depending on the type of grant, rapid or large drawdowns towards the beginning of a budget period may be consistent with the project activities and approved budget. For example, recipients of fellowship grants draw a large proportion of grant funds at the beginning of the budget period to pay for the entire semester's expenses. In this case, the US/ED program officer makes a notation in the official grant file and informs US/ED program officials that the drawdowns are justified.

**Q7. What are the audit requirements for our grant(s)?**

The audit requirements of EDGAR, set forth in Office of Management and Budget (OMB) Circular A-133, implement the Single Audit Act Amendments of 1996. The Circular provides uniform requirements for colleges and universities. Under these requirements, grantees that expend more than \$300,000 annually in federal awards must have a single audit performed at least every two years. There are two types of audits for discretionary grant projects. The first type is the one your institution arranges to have done by independent auditors in response to OMB Circular A-133. Generally, OMB Circular A-133 audits look at expenditures of federal funds across an entire organization instead of specific costs of individual grants. The second type is an audit for fiscal and program compliance done by the US/ED Office of Inspector General (OIG). Audits conducted by OIG occur less frequently than A-133 audits and not every grantee receives one. The Office of the Chief Financial and Chief Information Officer (OCF&CIO) is the office in the Department that reviews A-133 audit reports. OIG audits are most often triggered by serious audit findings identified during OCF&CIO review of the A-133 audit reports.

**Q8. What are "Expanded Authorities Regulations", and how do they affect the NRC and FLAS grants?**

The "Expanded Authorities Regulations" became effective in 1997 to reduce the administrative burden between US/ED and grantees by eliminating the prior approval requirement for certain administrative actions and to give grantees greater flexibility in planning and implementing their project activities. Contained in §74.25 of the Education Department's General Administrative Regulations (EDGAR), the expanded authorities regulations permit grantees to do any one or more of the following without prior approval, unless the program statute, regulations, or Attachment Z to the grant award notification prohibits such actions—

- (1) obligate funds up to 90 days before the effective date of a budget period;
- (2) transfer funds among budget categories;
- (3) carry funds over from one budget period to the next; and
- (4) extend the grant automatically at the end of a project period for a period of up to one year.

The "Expanded Authorities Regulations" are applicable to FY 2003 – 05 NRC grants only. FY 2003 – 05 FLAS grants must comply with the provisions in Attachment Z to the grant award notification because of the restrictions for fellowship periods specified in the program regulations.

**Q9. What are our responsibilities regarding the submission of annual and final performance reports?**

Grantees should put as much care into timely, accurate, and comprehensive reporting of activities conducted as was put into planning them when writing the funded application. Your performance reporting becomes the basis for US/ED evaluation of the effectiveness of its programs, as well as its own reporting to the Congress, other US/ED officials, and to the public.

Schedules indicating the due dates for submitting annual and final performance reports for the National Resource Centers grant and the Foreign Language and Area Studies Fellowship grant were included with Attachment B of the grants' FY 2003 Grant Award Notifications.

As recipients of multi-year grants, you must submit an annual performance report in order to receive continuation funding. The annual performance report provides data on the status of the approved project and any approved adjustments. In accordance with EDGAR §75.118, the report must provide the most current performance and budget information, and it must demonstrate that you have made substantial progress in attaining the objectives of the grant.

Grantees are also responsible for submitting a final performance report within 90 days after the end of the project period.

**Q10. *What happens if we do not send US/ED the required reports?***

Not sending reports or other required documents can place the institution in noncompliance with the terms and conditions of the grant award. Additionally, noncompliance jeopardizes your opportunity for future funding from the Department. Therefore, it is critical that you submit all reports by the due dates specified in Attachment B.

**Q11. *Do we have to keep any records related to our grant(s) after US/ED closes out our grant(s)?***

Yes. Because discretionary grants fall under the record retention provisions of the General Education Provisions Act (GEPA), you are required to retain grant records for three years after the completion of the activities for which grant funds were used (usually interpreted by US/ED as three years after the end date of the project period.) Retaining records is especially important should you have an audit of the grant(s) after they have been closed out.

## FAQs ABOUT NRC PROGRAM GRANT ADMINISTRATION

### QUESTIONS ABOUT THE BUDGET

**Q12. *May we expend funds before the start of the grant?***

Yes. You may incur pre-award costs for allowable items and activities of a project up to 90 calendar days before the beginning of either a new award or a non-competing continuation award without prior US/ED approval. Be advised, however, that all pre-award costs are incurred at the grantee's risk. US/ED is under no obligation to reimburse these costs if you do not receive the grant, or if the amount of the grant is less than anticipated and inadequate to cover these costs.

**Q13. *May an NRC revise its budget by transferring funds between approved budget line items?***

Yes. Under the "Expanded Authorities Regulations", NRCs are given greater flexibility than before to make budget transfers within grant projects without prior US/ED approval. In exercising this flexibility, grantees are advised to make budget transfers that are allowable, allocable, and reasonable to promote successful project implementation.

Even with this greater flexibility, NRCs should know there are conditions that prohibit certain budget revisions without prior US/ED approval. These conditions are specified in EDGAR §74.25(c).

Also, grantees should be vigilant in monitoring the number of revisions made to the approved budget, as excessive revisions can be interpreted either as weaknesses in program planning or a lack of administrative oversight of the project.

**Q14. *May we delete line items from or add new line items to our NRC budget or make programmatic changes to our project without informing US/ED?***

It depends. Even though the "Expanded Authorities Regulations" permit grantees to make budget and program adjustments contained in EDGAR §74.25(e), you must be judicious in making adjustments to the NRC budget or project activities, to ensure these revisions do not materially change the project scope or objectives of the NRC grant. Your NRC grant is the result of a competitive review process, and as such, you may not subsequently make, and US/ED cannot approve revisions that change the scope of funded activities. If circumstances warrant budget or program revisions to the NRC grant, and the revisions do not change the project scope, you do not have to inform US/ED. If you have questions about whether a revision is allowable or not, you should contact your program officer for technical assistance.

If after consulting with your program officer it is decided the revision requires US/ED approval, you must submit the revision with sufficient justification. The request may be submitted via e-mail, fax, or regular mail. Regardless of method used to submit the request, remember that it must come from the Project Director.

**Q15. *If US/ED determines that we have to submit our program or budget revision for approval, what is the timeframe for receiving a response?***

Within 30 calendar days from the date of receipt of the revision request, US/ED shall review it and notify you whether the request has been approved. If the revision request is still under consideration at the end of 30 calendar days, US/ED informs you in writing of the date when you may expect the decision. (EDGAR 74.25 (m))

**Q16. *If an NRC activity originally scheduled for the current budget period has to be postponed and conducted in a subsequent budget period, may we carry the unused funds forward?***

Yes. Unexpended funds at the end of one budget period are made available for use in the next budget period.

**Q17. *May we use grant funds to pay for meals or incentives such as mugs or pens, in order to attract persons to Center activities?***

No. These are unallowable costs under the Office of Management and Budget (OMB) Circular A-21, "Cost Principles for Educational Institutions."

**Q18. *If a cost is allowable under OMB Circular A-21 and is relevant to our project, may we charge such a cost against the NRC grant, even though it is unallowable under the statute and regulations?***

No. Title VI statute, NRC regulations, and IEPS policy supercede OMB guidance.

**QUESTIONS ABOUT CARRY-OVER:**

**Q19. *What is carry-over and how is it implemented?***

"Carry-over" refers to using unexpended funds from an expired budget period for use in the (immediate) next budget period. This means that you can carry forward unexpended funds from Year 1 to Year 2; or carry forward unexpended funds from Year 2 to Year 3. But, you are not permitted to carry forward unexpended funds from Year 1 to Year 3.

Under the "Expanded Authorities Regulations," grant funds are carried over automatically from one budget period to the next, without the need for prior US/ED approval or action on your part. Grant funds from any budget period are paid out from GAPS on a first-in, first-out (FIFO) basis, with the result that any funds remaining from one budget period are paid in the next budget period **before** newly awarded funds are made available to the grantee. Thus, carry-over funds are never available for payment or use beyond an immediately following budget period and will never be moved across budget periods (e.g., from Year 1 to Year 3 of a grant project period).

At the time you submit your annual performance report for continuation funding, you may be required to provide comments indicating the activities the carry-over funds will be used to support; and any activities that were not completed in the previous budget period and why.

**Q20. *For what activities may we use carry-over funds?***

Grantees may use unexpended funds in the following budget period to conduct uncompleted activities from the preceding 12-month budget period. Additionally, after consultation with the program office, grantees may also use unexpended funds for any allowable cost that falls within the scope and objectives of the project.

**Q21. Do we need to submit a request to carry-over funds from Year 1 to Year 2 or from Year 2 to Year 3?**

No. You have the authority to carry unexpended funds forward. But having this authority and flexibility does not mean that US/ED relinquishes project oversight regarding carry-over. If US/ED has reservations about a grantee's use of carry-over funds, i.e., if the use of carry-over funds is inconsistent with program regulations or causes a change in project scope or the objectives of the grant, EDGAR provisions permit US/ED to require a written statement from grantees describing the ways it intends to use remaining funds.

**QUESTIONS ABOUT ONE-TIME (NO-COST) EXTENSION:**

**Q22. What is a one-time “no-cost” extension?**

A “no-cost” extension permits grantees to extend the **project period** end date of a grant one time for a period up to 12 months. Such a change does not need prior US/ED approval, except when such an extension would:

- require additional federal funds;
- change the scope or objectives of the project;
- be merely for the purpose of exhausting unexpended funds; or
- be inconsistent with federal statute, regulations, or grant conditions
- enable the grantee to undertake activities not approved as part of the project

**Q23. Do we need to notify US/ED if we plan to extend the end date of our NRC grant?**

Yes. You are required to notify US/ED of a planned extension at least ten days before the end of the project period, with supporting reasons for the extension. While EDGAR permits a ten-day lead time, program officers prefer notification at least 30 days in advance, to give us time to review your letter and to change the project end date for your grant in the Grant Administration and Payment System (GAPS), so that Financial Payments Group does not close the grant prematurely under its automated procedures. If the US/ED program officer concurs with the extension request, copies of the amended Grant Award Notification (GAN) with the new end date are printed from GAPS. The program officer signs the GANs, mails copies to the grantee and retains a copy in the official grant file along with the notification letter the grantee submitted.

**Q24. What information do we include in a no-cost extension notification letter?**

To demonstrate that grantees are not giving themselves no-cost extensions simply for the purpose of using up unexpended funds, you must justify the need for the extension under this standard. To effectively do this, your letter of notification should include:

- The PR/Award number of the current grant;
- The activities to be carried out during the extension;
- The reason(s) why the activities could not be carried out during the final budget period;
- The amount of funds to be used during the extension; and
- The new end date to which project period is extended.

**Q25. Does US/ED automatically accept our notification and justification for a no-cost extension?**

No. In deciding whether to accept your explanation for use of the remaining funds, the program officer must consider whether the use of the funds is within the scope or objectives of the grant and whether the grantee has fiscal management issues. If the program officer does not accept the grantee's explanation of the reasons for the funds remaining and/or their intended use, the program staff can deny the time extension and notify you immediately in writing with the reasons for denying the extension. A copy of the grantee's letter of notification along with the reason(s) for denying the extension is placed in the official grant file.

**Q26. For our NRC budget, when is a carry-over implemented and when is a one-time no-cost extension implemented?**

Here are the appropriate terms for using unexpended funds during the FY03-FY05 grant cycle:

- Year 1: You may **carry over** funds from the August 15, 2003- August 14, 2004 budget period to the next budget period.
- Year 2: You may **carry over** funds from the August 15, 2004 -August 14, 2005 budget period to the next budget period.
- Year 3: If funds remain unexpended after the end of the August 15, 2005 - August 14, 2006 budget period, you may request a **one-time/no-cost extension** for up to 12 months.

**Q27. If the NRC grant is a consortium grant, and one of the partner institutions needs a one-time/no-cost extension, which institution submits the letter of notification to US/ED?**

The institution identified in Block 1 of the Grant Award Notification is the official grantee on behalf of the consortium, and as such is responsible for submitting the letter of notification to US/ED on behalf of partner institutions.

**QUESTIONS ABOUT DOMESTIC AND FOREIGN TRAVEL:**

**Q28. Our NRC project includes domestic and international travel. Are we required to submit domestic travel requests to US/ED for approval?**

No. Domestic travel in conjunction with NRC approved activities does not require US/ED approval.

**Q29. Our NRC approved budget lists the international trips proposed for the grant cycle and the costs needed for the international trips. Are we still required to submit foreign travel requests to the US/ED program officer for approval?**

Yes. The approved budget is your budget plan, but US/ED must approve international travel prior to your obligating any funds associated with the international travel, including transportation, per diem costs, ground transportation, etc.

You may submit international travel requests either by e-mail, fax, mail, or the travel approval request form. Regardless of method used, please include the following in the request:



- The person's name and position (faculty, librarian, administrator)
- Destination(s) (city/ies, country/ies)
- Purpose for the trip (acquisitions, conference, linkages, research)
- Date departing from and date returning to the United States
- Amount of NRC funds used for transportation, per diem, etc.
- When NRC funds are used for airline ticket(s), provide destinations for all legs of the international travel and the air carrier(s)

**Q30. *How much "lead" time does US/ED need to review and approve our foreign travel approval requests?***

To the extent possible, US/ED program officers strongly encourage Centers to submit foreign travel approval requests **at least 30 days** prior to the date the traveler is to conduct the trip. This advance time gives the program officer sufficient time to review requests for compliance with the Fly America Act, to determine whether the travel is consistent with the NRC project scope and objectives, and if the travel is for extended research overseas, sufficient time for notifying US embassies. It also gives Centers sufficient time to make revisions and resubmit a request, if the program officer does not approve the initial submission.

**Q31. *While the Center is waiting for approval from the US/ED program officer, is it permissible for the traveler to purchase the airline ticket?***

No. The traveler should not purchase the airline ticket unless and until the Center receives official approval from the US/ED program officer. Travel that is not approved cannot be charged to the NRC grant.

**Q32. *If the traveler goes overseas to conduct NRC activities, returns, and then notifies the Center, may the Center still submit a travel approval request to the program officer for US/ED approval?***

No. This constitutes retroactive approval, and this is not allowable. In a case like this, the travel must be paid for with non-Title VI grant funds.

**Q33. *Do we have to use an U.S. flag carrier even though it would be less expensive to use a foreign airline for the same itinerary?***

Yes. The Fly America Act explicitly states that cost-savings is not a reason to waive compliance requirements. All travel supported by federal grants must comply with this law.

**Q34. *If our travel agency confirms an extenuating circumstance, e.g., no U.S. flag carrier is available due to high volume holiday travel, may we use a foreign air carrier instead and charge the ticket to the NRC grant?***

No. If this is the case, the travel will either have to be postponed, or the ticket purchased with non-Title VI funds.

**Q35. *For domestic and foreign travel, is it okay if the return date comes after the end of the budget period?***

Yes, because funds for the travel have already been obligated, in accordance with EDGAR §75.707. However, if the traveler will be returning after the end date of the **project period**, you must notify US/ED that a one-time/no-cost extension is needed.

**Q36. *Can we use NRC funds to support student travel?***

Generally speaking, no, because the purpose of the NRC program is to support activities that contribute to the long-term strengthening of the Center's academic and outreach programs. Given this context, it is not appropriate for Centers to use grant funds to support student travel.

On a case-by case basis, however, the program officer can review such requests because the program regulations allow the use of NRC money to support *transportation* costs for (a) undergraduates enrolled in a formal program of supervised study, and (b) graduate students traveling to research sites or conferences.

#### **QUESTIONS ABOUT THE CONTINUATION GRANT AWARD:**

**Q37. *How do we receive funding for the remaining budget periods of our grant?***

You must submit an annual performance report to US/ED before you can receive a continuation grant award after the first year of your three-year grant. The annual performance report includes up-to-date data, budget and narrative information that demonstrate substantial progress in attaining the approved objectives of the NRC grant. The annual performance report should also specify any changes that need to be made to the project in the upcoming funding period. Before a continuation grant award is issued, US/ED program officers review the annual performance reports to determine whether you have made substantial progress. If substantial progress is demonstrated, the program officer accepts the report, and two copies of the Grant Award Notification are issued within four to six weeks after you have submitted your report.

**Q38. *Will our NRC automatically receive the funding amounts originally recommended for the subsequent budget periods?***

Not necessarily. Although US/ED informs you in Year 1 about the prospective funding amounts for Year 2 and Year 3, these amounts are not binding. Continuation grant awards can be affected by a variety of factors, including a change in Congressional appropriation, a determination that substantial progress has not been made, or other programmatic or budgetary factors.

If there are changes to the continuation grant award amount, you will be required to submit a revised budget.

#### **QUESTIONS ABOUT CHANGES IN KEY PERSONNEL (PROJECT DIRECTOR):**

**Q39. *Why are we required to provide US/ED the curriculum vitae (CV) for the Project Director?***

We request the CVs because the Project Director is the key personnel position that has a direct bearing on the outcomes of the project; and, it is our responsibility to ensure that the person specified in the Grant Award Notification possess the qualifications and knowledge appropriate for the funded project.

**Q40. *What do we do when we change Project Director from the person named in our application and grant award notification?***

EDGAR §74.25 requires grantees to submit to US/ED a letter requesting the change along with a current CV for the new Project Director. An authorized representative of the institution must sign the letter requesting the change. Grantees may either fax or mail the letter and CV to the US/ED program officer.

Upon receipt, the program officer reviews the letter and CV, makes the administrative change in the Grant Administration and Payment System (GAPS), and sends you revised Grant Award Notifications.

The **lead institution** of a consortium grant follows this same procedure when there is a change in Project Director at the lead institution. When the Project Director/Principal Investigator changes at a partner institution, that institution may send a letter and CV to the program officer for informational purposes but not for official administrative action.

**Q41. *What kinds of requests and actions submitted to US/ED need to be signed by the Project Director?***

The Project Director must sign all administrative action requests (key personnel change, project date change, DUNS change) that require US/ED to issue a revised Grant Award Notification. Also, budgetary materials such as a revised budgets or budget revision requests affecting the project scope, and program-related requests like foreign travel approval requests must be signed by the Project Director or an authorized representative.

**QUESTIONS ABOUT NRC PROJECT ACTIVITIES:**

**Q42. *May we use NRC funds to conduct outreach to foreign constituencies?***

It is an unallowable use of funds to conduct outreach to foreign constituencies. Outreach funded with NRC monies must be used to conduct activities that serve K-12, postsecondary, and general public constituents in the United States. Conducting local, national and regional outreach activities is consistent with the purpose of the program --to strengthen the language, area and international studies capacity in the United States.

**Q43. *May we use NRC funds to support ethnic studies?***

No. Although ethnic studies may have relevance to NRC activities in terms of comparative issues, it is not appropriate to use NRC funds for activities related to ethnic studies course development, outreach, symposia, etc. Ethnic or multicultural studies focus on US society and therefore are not part of the approved scope and objectives of Title VI projects.

**Q44. *Periodically, we have internal and external evaluations of our Center. Additionally, students evaluate courses and instructors. Is this a comprehensive evaluation plan?***

While these strategies undoubtedly render feedback on strengths and weaknesses of activities, Centers should implement evaluation plans that will provide quantifiable data, and that will enable you to measure the "breadth and depth" impact of the various components of your NRC project. To be comprehensive, the evaluation plan should examine all activities, including: instruction, outreach, language training, course development, professional development workshops, conferences, lecture series, instructional and outreach materials development projects, distance learning courses, websites, and teacher resource centers, among others. The evaluation plan should also assess administrative oversight and budget and program planning.

**Q45. *May we use NRC funds to purchase computers and other standard office equipment for the Center?***

Using grant funds to purchase “routine” office equipment is not unallowable, but because program funds are limited, and grantees are encouraged to use NRC funds for strengthening the long-term capacity of grant activities, US/ED IEPS program officers usually disallow such purchases.

Another consideration for not approving equipment purchases is the Government Performance and Results Act of 1993 (GPRA). Under the GPRA, the granting agency and grantees are responsible for demonstrating that funded activities result in quantifiable and meaningful outcomes to justify programs. To be able to do this, US/ED program officers advise grantees to expend grant funds for items that enable them to better demonstrate the success of NRC activities.

Routine office equipment (computer, fax machine, scanner) are operational costs, and therefore inconsistent with the overall intent of the GPRA, as well as the National Resource Centers program.

If these items are needed to conduct the work of the Center, they should be purchased by the institution.

**Q46    *How often do program officers conduct site visits?***

There is no established schedule for visiting funded projects during the course of a grant cycle. While we would like to visit as many projects as possible, the US/ED has limited resources for travel. If opportunities to conduct site visits arise, we will notify Centers well in advance in order to plan a comprehensive review of your project.